

# EXHIBIT 4

**AFFIDAVIT OF JOSEPH ZIMMERMAN**

JOSEPH ZIMMERMAN, BEING OF FULL AGE, ON HIS OATH, DEPOSES AND SAYS:

1. I am over the age of 21 years and if sworn as a witness I am competent to testify about the matters set forth herein based on personal knowledge except where the matter is indicated to be based on information and belief.
2. I am currently a second-year law student at the University of Michigan. Prior to law school, I served in the United States Air Force for four years. I was honorably discharged from the service with the rank of captain. During my four years of service, I was stationed at FE Warren Air Force Base in Cheyenne, Wyoming where my duties included operating nuclear weapons.
3. I am a registered voter in Ann Arbor, Michigan.
4. I volunteered as a poll worker in Ann Arbor on November 3, counting ballots all night until approximately 5:30 a.m. in the morning on November 4. On the morning of November 4, I learned via social media that there was a need for non-partisan challengers at the absentee voting counting board (AVCB) at TCF Center in Detroit because of tensions there overnight. Upon learning of the need, I decided that it was my duty to keep working to ensure a free and fair election, so I headed out to TCF, arriving around 11:00 a.m.
5. I entered TCF as a non-partisan challenger credentialed by the Lawyers Committee for Civil Rights Under Law (LCCRUL), and registered as such when I entered the room.
6. I was present at the TCF Center between approximately 11:00 a.m. and 4:00 p.m. on November 4. During my time there, I was regularly patrolling inside the AVCB counting room in an attempt to provide support to election inspectors and challengers whenever a tense situation arose. Such situations arose often and, in my observations, were exclusively attributable to aggressive and intimidating actions by Republican challengers. As someone who had been a poll worker in Ann Arbor the night before, I was familiar with the process of counting ballots. I witnessed no improper actions by any election inspector. The only improprieties I

saw were from Republican challengers. As a veteran, I was particularly shocked by the fact that Republic challengers attempted to stop the counting of military ballots (more on that below).

7. From the moment I arrived, I observed aggressive and intimidating actions by Republican challengers. On several occasions, I saw five to ten such challengers crowd around a table at once, encroaching on the personal space of election workers (much less than six feet away) and harassing them with repetitive questions. I had been trained that our job as challengers was to observe and, if necessary, challenge particular ballots—not to speak directly to election workers, let alone interrogate or badger them, which is what I was observing.
8. On several occasion, I received a text message from other non-partisan challengers asking me to come to wherever they were in the room because they were the only non-Republican challenger at a table at which several Republican challengers were acting menacingly.
9. I witnessed one Republican challenger be removed from the room for filming the proceedings. I had been trained that filming inside the AVCB was prohibited conduct by a challenger.
10. The dynamic I witnessed was particularly striking when compared to my experience as an election inspector in Ann Arbor, where challengers stood a respectful distance away and allowed me to do my job. By contrast, at TCF, it was difficult not to notice the racial dynamic of aggressive, mostly white, challengers invading the personal space of election workers, who were mostly Black, and repeatedly questioning them and making it difficult for inspectors to continue with their work.
11. Around 1:00 p.m., things slowed down in the AVCB. An election inspector told me that most of the regular absentee ballots had been counted and that they were waiting for the military ballots to arrive and be counted.
12. Meanwhile, between 1:00-2:00 p.m. challengers from both parties (and non-partisan challengers like me) were receiving news on their phones about the progress of the election. Specifically, challengers became aware that Wisconsin

had been called for Joe Biden by news networks and that the networks were predicting that Detroit's ballots might put Joe Biden in the lead in Michigan.

13. The military ballots arrived in the room just before 2:00 p.m.
14. I neither saw nor heard of any other ballots being brought into the room around that time despite the fact that I was circulating throughout the room.
15. Around that time, I headed towards the front of the room to pick up a delivery of additional masks that were being brought for the challengers, and I realized how heated things were becoming outside the counting room. There were approximately 20-30 Republican challengers standing near the door to the counting room yelling at police officers.
16. Around 2:00 p.m., word rapidly circulated through the room via social media that the Trump campaign had filed a lawsuit to stop the count in Detroit, although I later learned that a lawsuit had not yet been filed at that time.
17. Around 2:30 p.m., it was announced that the counting room had hit COVID capacity and that no one else would be allowed in the room. I could not precisely count the number of challengers for each party, but my observation at that time, and throughout my time at TCF, was that the number of Republican challengers seemed roughly proportionate to the number of Democratic challengers. Indeed, as I said above, I repeatedly saw Republican challengers congregating in groups to aggressively question or challenge poll workers in settings where there was no Democratic challenger or only one Democratic or non-partisan challenger.
18. Around the time that the room closed, I witnessed a Republican challenger in his 30s or 40s with short hair and glasses in a tan sweatshirt or sweater standing by the window to the room writing messages to someone on the outside of the room. A short time later, I saw and heard the man with the tan sweatshirt say to another challenger, "We are going to start yelling 'STOP THE COUNT.'" And that is what he did, beginning to yell it loudly inside the AVCB center. The chant did not catch on inside, but it did catch on outside, and the Republican challengers gathered in the lobby outside were chanting and yelling for approximately a half an hour and banging on the all-glass wall that separated the counting room from the lobby.



19. I also witnessed approximately 5–10 Republican challengers standing outside the glass doors filming what was going on inside, which was prohibited. That was when workers inside the counting room began covering the windows, and my understanding was that they were doing so to prevent prohibited filming of the AVCB.
20. As the chanting was going on outside, I heard several Republican challengers inside discussing a plan to begin challenging every single vote on the grounds of “pending litigation.” And that is what they did: repeatedly challenging the counting of military ballots for no reason other than “pending litigation”.
21. Eventually, the Republican challengers stopped challenging every military ballot after several Republican challengers were removed from continuing to make such challenges without a lawful basis. Shortly after it became clear that the military votes would be counted despite the efforts to stop that from happening, I decided that it was time to leave and make room for new observers.
22. I am still processing my emotions from what I witnessed in TCF Center on November 4th. Honestly, the whole thing mostly just made me sad. I do not understand how people can be so tied up in who they want to be elected so much that they would be willing to harass poll workers and seek to stop the counting of votes—military votes, no less—in the way that I witnessed. As someone who served in the military, I was willing to sacrifice my life so that we would all have the right to vote. I thought that that was something we all believe in as Americans. It broke my heart to see that some of my fellow Americans disagree, and that they were willing to try to undermine this sacred right.

**AFFIRMATION**

I affirm that the contents of this affidavit are true and correct to the best of my knowledge.

Signature of the person making this affidavit: \_\_\_\_\_

Affirmed before me this <sup>10</sup>~~11~~ day of Nov, 2020 at 3:02 pm

My commission expires on 2/10/2026

Signature of Officer Administering Oath Julie M. Aust Title Notary Public

JULIE MARIE AUST  
Notary Public, State of Michigan  
County of Washtenaw  
My Commission Expires 02-10-2026  
Acting in the County of Washtenaw